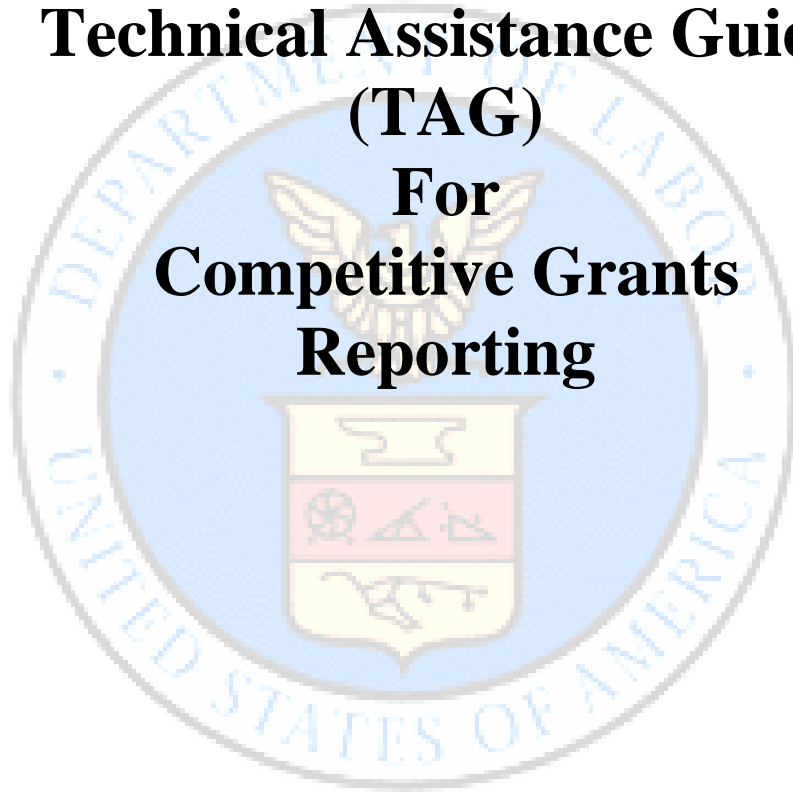# Technical Assistance Guide (TAG)
For
Competitive Grants
Reporting

PY 2014

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Introduction

The following Technical Assistance Guide (TAG) for Competitive Grants Reporting provides useful and necessary information for grantee personnel as well as VETS staff who are responsible for grant oversight. VETS grant programs are required to collect and report program performance under a Federal wide methodology called Common Measures. While not all of the data and information that VETS collects is driven or required by this methodology, grantees must be familiar with the Common Measure reporting concepts to ensure that their grant program complies with the laws and related oversight that provide employment and training assistance to our nation's veterans.

Common Measures reporting was instituted to evaluate the effectiveness of similar service programs across different executive departmental level agencies for the purpose of improving the overall management of the Federal Government. An important benefit of Common Measures reporting is that it allows for grantees to account for all participants who were enrolled during any program year – both those participants who were successfully placed and those who were not. VETS requires grantees to report both placement and entered employment data to ensure that the Homeless Veterans' Reintegration Program (HVRP) and Veterans' Workforce Investment Program (VWIP) will be able to compare current performance outcomes against historical outcomes as mandated by their authorizing legislation. Implementing Common Measure benefits the VETS Competitive Grants program in these specific ways:

➢ Common Measures established a consistent methodology across all federal programs that allow us to highlight our comparable successes. Our history of success, especially within the HVRP, has lead to incremental increases in funding allocations since the inception of the program.

➢ While VETS implements Common Measures, some of the pertinent "old" measures that were previously used will continue to be reported to allow us to analyze trend data and compare future results against current performance. This strategy also enables VETS to explain any declines in future performance that may be result from the different manner in which Common Measure methodology assesses program performance.

➢ VETS expects that once Common Measures reporting is fully incorporated into all HVRP and VWIP competitive grants, that the actual grantee performance levels for long-term employment retention will increase. This result will add additional creditability to our claim of on going program success.

The TAG is organized into four sections, including this introduction. The first section presents the *Key Concepts and Definitions* that you must know to effectively report your grant's performance. Section II presents an overview of the *Technical Performance Report (TPR)*. The TPR is a reporting tool that was designed by VETS to assist grantees to properly prepare and provide their performance results for input into the electronic reporting system called VOPAR.   Section III presents the detailed *Instructions for the PY 2012 Technical Performance Report (TPR)*.   These instructions will help grantees to better understand the VETS reporting requirements by explaining in a "step-by-step" manner how to fill out the TPR and how to recognize common or frequent reporting related errors.

Section I: Key Concepts and Definitions

To understand the overall VETS Competitive Grants Reporting requirements, grantees must understand the key concepts and data element definitions being used by VETS to assess program performance. Most of these key concepts and definitions involve Common Measures reporting methodology, but more importantly they all contribute to a strategy to accurately describe the performance of each individual grantee as well as the collective competitive grant programs as a whole. Below are the major definitions that will impact grantee performance reports:

➤ **Participant**: An individual who is determined to be eligible to participate in the program and who receives a service funded by the program. A Participant is equivalent to an Enrollee in HVRP and VWIP.

➤ **Placement Into Employment**: Eligible Participants who secure or obtain employment as a result of grantee provided services. Grantees are allowed to report and take credit for one (1) placement per enrolled eligible participant per Program Year. **Note: Placement into Employment is NOT a Common Measures reporting element, however, VETS tracks placements to preserve consistency with prior year reporting and performance results. Also, while you may only report one "official" placement per enrolled eligible participant within the official reporting tools, you may track and report total placement "transactions" (when a participant is placed into employment multiple times) within your narrative reports.**

➤ **Exiter:** A participant who is *placed* **or** *dropped* during a quarter **and** has not received services for 90 days and is not scheduled to receive future services. The following services do **not** count as "future services":

  o Additional Career Planning
  o Contacting the Employer
  o Assisting with Work-Related Problems
  o Peer Support Groups
  o Informational Mailings, and
  o Referral to Supportive Services.

  Once a Participant Placed into Employment becomes an Exiter, the sequence for tracking outcomes is determined by the Exit Quarter. Those Participants experiencing a gap in service of 90 days or more due to a delay before the beginning of training, a serious health/medical condition; and/or temporary departure from the area such as for National Guard/Reserve duty may be underlined temporarily exempted from being exited for a portion of the grantee's period of performance. *Note: Retention services, while extremely important, are not considered "active" or pre-employment services that delay a Participant exit.*

  The general rule is that **_all Participants are to be exited_** by the end of 4th quarter of each Program Year. Those participants who were exited because of the conclusion of the Program Year, and still actively seeking services (i.e. they were not placed, were not terminated and did not drop out), may be re-enrolled by the grantee in the next Program Year.

- **Exit Quarter**: The Exit Quarter represents the quarter in which the date of exit is recorded for the individual. The Exit Quarter is defined **retroactively** as the quarter during which the Participant received the last service. For Example: A Participant's last date of service is during the 1st grant quarter. During the 2nd quarter it is determined that he/she qualifies as an **Exiter**, so the **Exit Quarter** is the 1st quarter but it is **reported** during the 2nd quarter. The first quarter that Exiters are reported is in the 2nd quarter (for those who exited during the 1st quarter).

- **Entered Employment**: The status of Participants who are employed (earning wages) in the first quarter **after** the Exit Quarter. This is the most significant definitional change for HVRP and VWIP under Common Measures. The first quarter that a grantee can report any "Entered Employments" is the 2nd quarter.

- **Entered Employment Quarter**: The Entered Employment Quarter is the quarter **after** the Exit Quarter or the quarter that the Participant becomes an Exiter.

- **Entered Employment Rate:** The Number Employed in the Entered Employment Quarter divided by Number of Exiters during the Exit Quarter. "Exit" is retroactive to the previous quarter. For quarterly reporting, the Entered Employment Rate is the percentage of those employed in the current quarter out of those who exited during the prior quarter. *Note: The Entered Employment Rate is automatically calculated within the TPR.*

- **Employment Retention**: Employment (any earned wages) in **both** quarters after the Entered Employment Quarter (or all three quarters after the Exit Quarter). It does not have to be the same employer or continuous employment, but the Participant must have had some earned wages in **both** quarters after the Entered Employment Quarter. A point in time follow-up must be made and documented in the case management file as to how many hours the person is working each week and what is their current hourly wage. This information is entered into the spreadsheet provided.

- **Employment Retention Rate:** The number of participants employed in both quarters after the Entered Employment Quarter (all three quarters after the Exit Quarter) divided by the number who Entered Employment in the Entered Employment Quarter. *Note: The Employment Retention Rate is automatically calculated within the TPR.*

- **Average Earnings**: This is based on all earnings during the two quarters after the Entered Employment Quarter. It includes only those Participants who meet the Employment Retention criteria. A Participant who Entered Employment but did not meet the Employment Retention criteria should and will **not** be included in the Average Earnings. *Note: The Average Earning is automatically calculated within the TPR.*

  Average earnings is equal to the total earnings in the 2nd and 3rd quarters after exit for those participants who earn wages in all three quarters after exit divided by the number of participants who earn wages in all three quarters after exit, otherwise referred to as employment retentions. *Note: Grantees must verify and document participant wages in the appropriate participant case management files.*

The following are *approved methods* of gathering and reporting Average Earnings:

1) Approved Supplemental Data sources include:
   - Participant pay stubs;
   - Employer confirmation of employment letters; and
   - Documentation of grantee phone conversation(s) confirming employment with participant and/or employer.

2) The Wage Record Interchange System (WRIS) and administrative records from the U.S. Office of Personnel Management (OPM), the Department of Defense (DOD) or the U.S. Postal Service also may be used, and

3) For HVRP/VWIP grantees, collecting and maintaining quarterly "pay stubs" from Exiters is a suggested standard procedure to implement.

The following *standard requirements*, no matter which of the approved methods are applied, include:

1) All data sources and methods used must be documented and are subject to an audit.

2) A point in time follow-up must be made and documented in the case management file during the 2nd and 3rd quarters following the exit quarter, and

3) Documentation as to how many hours the person is working a week and what their current hourly wage is must be entered into the spreadsheet provided with supporting documentation entered into their case management file.

➢ **Employment Retention and Average Earnings Quarters**: The Employment Retention and Average Earnings Quarters are the two quarters after the Entered Employment Quarter. Those two quarters provide the basis for measuring both Employment Retention and Average Earnings.

Section II: The Technical Performance Report (TPR)

Certain information must be gathered for reporting and assessment purposes.   The Technical Performance Report (TPR) is an Excel workbook tool that was developed by the VETS National Office to assist grantees to manage their reporting process and to help them in providing the required quarterly data that is submitted into VOPAR. The TPR file is available at: http://www.dol.gov/vets/programs/common/main.htm

The TPR contains the following worksheets or tabs, in the order in which they appear in the workbook:

1) **Participants Tab** – provides 1000 rows for entering demographic and other information related to the grantee's program participants.

2) **VOPAR Reporting Tab** – summarizes information entered on the Participants tab and the Exit Quarter tabs. The grantee also directly enters Assessments, Training Activities and Expenditures on this tab.

3) **VOPAR Demographics Summary Tab** – summarizes the demographic and Green Jobs information entered on the Participants Tab. The enrollment and placement information on this tab is entered into VOPAR during the first four quarters of the grant period, or during the "active" quarters.

   Note: Quarterly sums for enrollments and placements have been added for the Gender, Ethnic Background, Age and Last Military Service demographic categories. These values should match your quarterly enrollments and placements that appear on the VOPAR Reporting Tab. If they do not, you haven't completed the Participants Tab correctly.

4) **Exited Q2** – contains 200 rows for exiting participants and providing entered employment and employment retention information for those exiters, when applicable. Those participants whose exit quarter is the 1st quarter are entered here.

5) **Exited Q3** – contains 200 rows for exiting participants and providing entered employment and employment retention information for those exiters, when applicable. Those participants whose exit quarter is the 2nd quarter are entered here.

6) **Exited Q4** – contains 200 rows for exiting participants and providing entered employment and employment retention information for those exiters, when applicable. Those participants whose exit quarter is the 3rd quarter are entered here.

7) **Exited Q5** – contains 400 rows for exiting participants and providing entered employment and employment retention information for those exiters, when applicable. Those participants whose exit quarter is the 4th quarter are entered here. That includes all remaining participants that haven't been exited previously.

   Note: For the four Exit Quarter tabs above, if you enter a 0 in column C, D or H, indicating that the participant didn't earn wages in that quarter after exit, the rest of the row should be left blank. You may continue to track the participant but this is not part of the reporting..

Section III: Instructions for the PY 2012 Technical Performance Report (TPR)

The following instructions provide a step-by-step process for entering data into the PY 2012 Technical Performance Report (TPR):

Please note the following:

➢ All areas in GREY are locked and are automatically calculated from data entered on the same tab or a different tab.

➢ All figures are entered NON-Cumulatively by quarter. Please refer to the glossary of terms for bolded terms.

Basic Requirements

To be entered once on the *VOPAR Reporting Tab*:

➢ Enter the Grantee Name
➢ Enter the Grant #
➢ Enter the Period of Performance
➢ Enter the Total Grant Award Amount

Quarterly Requirements

To be entered in each of the first four quarters of the grant, those "active" quarters in which you are allowed to enroll and provide training and services to participants.

On the *VOPAR Reporting Tab*:

➢ Enter the # of assessments conducted during the quarter
➢ Enter the number of participants who received the following training during the quarter (rows 29-35):

  o Class-Room-Training
  o On-the-Job Training
  o Occupational Skills Training
  o Apprenticeship Training
  o Upgrading and Retraining
  o Life Skills and Money Management
                              o Other Training

➢ Enter actual expenditures for the following (rows 46-48):

- o Participant services
- o Administrative costs
- o Stand-Down event costs

Note: You must obligate 100% of all funds by the end of the 6th quarter (December 31, 2015) and "liquidate" or "zero out" all unliquidated obligations by the end of the 7th quarter (March 30, 2016) for the final financial report. Don't forget to obligate enough funds for all follow-up activities.

On the *Participants Tab*:

➤ Enter participants enrolled in your program during the quarter (columns A-C) along with the demographic information (columns F-T) for these participants. For Yes/No questions, you only have to enter Yes values. *Note: It is important that all enrollments are entered, that the demographics are collected at the time of enrollment, and that the values entered are not changed after the quarterly data have been reported in VOPAR. Changes made in later quarters will cause inconsistencies in the data. Any request to change previously reported data, must be requested and approved through your GOTR and the Competitive Grants Lead at the VETS National Office.*

➤ Update all participants who have attained initial employment in the quarter by selecting the quarter number in *Column D* and entering the hourly wage at placement in *Column E*.

➤ If the participant is placed in a Green Job, select the appropriate green jobs sector and/or industry (listed below) in *Column AD*.

1) Energy-efficient building, construction, and retrofits industries;

2) Renewable electric power industry;

3) Energy efficient and advanced drive train vehicle industry;

4) Bio-fuels industry;

5) Deconstruction and materials use industries;

6) Energy efficiency assessment industry serving the residential, commercial, or industrial sectors; and

7) Manufacturers that produce sustainable products using environmentally sustainable processes and materials.

8) Other (Describe in TPN)

➤ Update all participants who were placed in transitional or permanent housing during the quarter in *Column U*.

➤ Update all participants who were referred to the VA for benefits during the quarter in *Column V*.

➢ Update all participants who were provided training, for the first time, during the quarter in *Column W*.

➢ Update all participants who were provided the specific support service, for the first time, during the quarter in *Columns X - AC*.

➢ Optionally, update all participants who were exited from the program during the quarter and select the appropriate quarter as their "Quarter Exited" in *Column AE*. By denoting the "Quarter Exited" for each participant on this tab, a subtotal of participants exited in each quarter will be calculated for you and displayed on the Exited Q2-Q5 tabs in the first row. This is intended to assist you in making sure that participants are entered on the appropriate Exit tab.

Additional 2nd Quarter Requirements

On the *Exited Q2 Tab*:

➢ Enter the Participant # and/or Name of those that exited the program during the 1st quarter.

➢ In *Column C* ("Earned Wages in 1st qtr after exit"), enter a 1 for Yes or a 0 for No, indicating whether or not the exited participant was employed and earned wages during the 2nd quarter. ***Note: If you enter a 0 in Column C, the rest of the row on the TPR should be left blank. You may continue to track the participant but not for reporting.***

Additional 3rd Quarter Requirements

On the *Exited Q2 Tab*:

➢ For only those exiters who earned wages during the 1st quarter after exit (i.e., 1 in Column C), perform follow-up activities during the 3rd quarter or shortly thereafter to determine if the exiters earned wages in the 3rd quarter (2nd quarter after exit.). If they did, obtain the number of hours worked per week and the hourly wage. In Column D ("Earned Wages in 2nd qtr after exit"), enter a 1 for Yes or a 0 for No. If you enter a 1 in Column D, enter the hours and wage information in Columns E and F. ***Note: If you enter a 0 in Column D, the rest of the row on the TPR should be left blank. You may continue to track the participant, but not for reporting.***

On the *Exited Q3 Tab*:

➢ Enter the Participant # and/or Name of those that exited the program during the 2nd quarter.

➢ In *Column C* ("Earned Wages in 1st qtr after exit"), enter a 1 for Yes or a 0 for No, indicating whether or not the exited participant was employed and earned wages during the 3rd quarter. ***Note: If you enter a 0 in Column C, the rest of the row on the TPR should be left blank. You may continue to track the participant, but not for reporting.***

Additional 4th Quarter Requirements

On the *Exited Q2 Tab*:

➢ For only those exiters who earned wages during the 1st and 2nd quarters after exit (i.e., 1 in columns C and D), perform follow-up activities during the 4th quarter or shortly thereafter to determine if the exiters earned wages in the 4th quarter (3rd quarter after exit.). If they did, obtain the number of hours worked per week and the hourly wage. In column H ("Earned Wages in 3rd qtr after exit"), enter a 1 for Yes or a 0 for No. If you enter a 1 in column H, enter the hours and wage information in columns I and J. ***Note: If you enter a 0 in column H, the rest of the row on the TPR should be left blank. You may continue to track the participant but not for reporting.***

On the *Exited Q3 Tab*:

➢ For only those exiters who earned wages during the 1st quarter after exit (i.e., 1 in Column C), perform follow-up activities during the 4th quarter or shortly thereafter to determine if the exiters earned wages in the 4th quarter (2nd quarter after exit.). If they did, obtain the number of hours worked per week and the hourly wage. In Column D ("Earned Wages in 2nd qtr after exit"), enter a 1 for Yes or a 0 for No. If you enter a 1 in Column D, enter the hours and wage information in Columns E and F. ***Note: If you enter a 0 in Column D, the rest of the row on the TPR should be left blank. You may continue to track the participant but not for reporting.***

On the *Exited Q4 Tab*:

➢ Enter the Participant # and/or Name of those that exited the program during the 3rd quarter.

➢ In *Column C* ("earned wages in 1st qtr after exit"), enter a 1 for Yes or a 0 for No, indicating whether or not the exited participant was employed and earned wages during the 4th quarter. ***Note: If you enter a 0 in Column C, the rest of the row on the TPR should be left blank. You may continue to track the participant but not for reporting.***

5th Quarter (Follow-Up) Requirements

On the *Exited Q3 Tab*:

➢ For only those exiters who earned wages during the 1st and 2nd quarters after exit (i.e., 1 in Columns C and D), perform follow-up activities during the 5th quarter or shortly thereafter to determine if the exiters earned wages in the 5th quarter (3rd quarter after exit.). If they did, obtain the number of hours worked per week and the hourly wage. In Column H ("earned wages in 3rd qtr after exit"), enter a 1 for Yes or a 0 for No. If you enter a 1 in Column H, enter the hours and wage information in *Columns I and J*. ***Note: If you enter a 0 in column H, the rest of the row on the TPR should be left blank. You may continue to track the participant but not for reporting.***

On the *Exited Q4 Tab*:

➢ For only those exiters who earned wages during the 1st quarter after exit (i.e., 1 in Column C), perform follow-up activities during the 5th quarter or shortly thereafter to determine if the exiters

earned wages in the 5th quarter (2nd quarter after exit.). If they did, obtain the number of hours worked per week and the hourly wage. In *Column D* ("earned wages in 2nd qtr after exit"), enter a 1 for Yes or a 0 for No. If you enter a 1 in Column D, enter the hours and wage information in *Columns E and F*. ***Note: If you enter a 0 in Column D, the rest of the row on the TPR should be left blank. You may continue to track the participant, but not for reporting.***

On the *Exited Q5 Tab*:

➢ Enter the Participant # and/or Name of those that exited the program during the 4th quarter. ***Note: All participants not previously exited must be exited on this tab so that the total number of exiters (Cell I17 on the VOPAR Reporting Tab) matches the total number of participants on that Tab (Cell I10). If it doesn't, either one of your participants entered on the Participants Tab isn't entered on one of the Exit Tabs, or you have a participant entered on one of the Exit Tabs that isn't on the Participants Tab, or you have one or more duplicates.***

➢ In *Column C* ("earned wages in 1st qtr after exit"), enter a 1 for Yes or a 0 for No, indicating whether or not the exited participant was employed and earned wages during the 5th quarter. ***Note: If you enter a 0 in Column C, the rest of the row on the TPR should be left blank. You may continue to track the participant but not for reporting.***

6th Quarter (Follow-Up) Requirements

On the *Exited Q4 Tab*:

➢ For only those exiters who earned wages during the 1st and 2nd quarters after exit (i.e., 1 in Columns C and D), perform follow-up activities during the 6th quarter or shortly thereafter to determine if the exiters earned wages in the 6th quarter (3rd quarter after exit.). If they did, obtain the number of hours worked per week and the hourly wage. In *Column H* ("earned wages in 3rd qtr after exit"), enter a 1 for Yes or a 0 for No. If you enter a 1 in Column H, enter the hours and wage information in *Columns I and J*. ***Note: If you enter a 0 in column H, the rest of the row on the TPR should be left blank. You may continue to track the participant but not for reporting.***

On the *Exited Q5 Tab*:

➢ For only those exiters who earned wages during the 1st quarter after exit (i.e., 1 in Column C), perform follow-up activities during the 6th quarter or shortly thereafter to determine if the exiters earned wages in the 6th quarter (2nd quarter after exit.). If they did, obtain the number of hours worked per week and the hourly wage. In *Column D* ("earned wages in 2nd qtr after exit"), enter a 1 for Yes or a 0 for No. If you enter a 1 in Column D, enter the hours and wage information in *Columns E and F*. ***Note: If you enter a 0 in column D, the rest of the row on the TPR should be left blank. You may continue to track the participant but not for reporting.***

7th Quarter (Follow-Up) Requirements

On the *Exited Q5 Tab*:

➢ For only those exiters who earned wages during the 1st and 2nd quarters after exit (i.e., 1 in Columns C and D), perform follow-up activities during the 7th quarter or shortly thereafter to determine if the exiters earned wages in the 7th quarter (3rd quarter after exit.). If they did, obtain the number of hours worked per week and the hourly wage. In *Column H* ("Earned Wages in 3rd qtr after exit"), enter a 1 for Yes or a 0 for No. If you enter a 1 in Column H, enter the hours and wage information in *Columns I and J*. *Note: If you enter a 0 in Column H, the rest of the row on the TPR should be left blank. You may continue to track the participant but not for reporting.*

Additional Data Entry Tips

1) **Do not cut and paste within the spreadsheet.** This will cause problems with the formulas used for automatic calculations. Instead, first cop y the information you'd li ke to move and then use Edit/Paste Special/Values from the top menu. Then clear out the copied information using your Delete key.

2) If a cell in your TPR displays **REF$**, this means that **one of the formulas has been overwritten due to cutting and pasting**. In that case, forward your TPR directly to VOPAR-HELP@dol.gov with a brief description of the problem. Your TPR will be fixed and sent back to you. Do not continue working on your TPR while it is being fixed because it is important to resume using the repaired TPR once you receive it.

3) When entering data on the TPR, **if a value shows up in red with a line through it, the data is incorrect** and you will need to review the directions and/or seek assistance from your DVET/GOTR for clarification.

4) If a cell in your TPR displays **#VALUE!,** this means that **something you entered in one of the cells on that row is interfering with a calculation.** Clear the invalid entry or entries and reenter the data.

5) **All data should be entered non-cumulatively**. On the *VOPAR Reporting Tab*, only enter "actual" performance and expenditure data for each quarter. *Column I* is the total column.

6) **Automated calculations are performed in areas shaded in gray - Do not attempt to directly update any of the data that is shaded in gray!** On the *VOPAR Reporting Tab*, all values associated with performance measures in *Column A* that are shaded gray are calculated from values entered elsewhere in the workbook, either on the same tab or from a different tab.

7) **Training Activities will be reported in an UN-DUPLICATED count**. Below the *Training Activities*, there is a breakdown of the type of training that was provided. This count may be duplicated depending upon the types of training provided to each participant. Many training activity categories were deleted from the previous report to simplify training activities. If not listed, place that count in the "Other Training" category. *Note: That 80% of all participants MUST have received some form of training listed*.

8) **Supportive Services are reported in an UN-DUPLICATED count.** Each participant will only be counted once for each of the *Supportive Services*. This means you count them once in the Job Search Assistance and once in the Tools/Fees, and once in the Other Supportive Services, etc. It does **not** mean that you can only give them one service in the group nor only provide them that

service once. You may provide them these services multiple times and continually. It **does** mean that you only annotate that they did get the service listed once. ***Note: The total for each supportive service line item on the right side of the form may not be higher than the total number of Participants***.

9) If a participant exits and then returns at a later date, the participant **may** be re-enrolled into the program.

Some Example Scenarios

Refer to the following to assist in illustrating certain Common Measure concepts:

1) **What if you record a placement, but the participant does not earn wages during the next quarter?**

   Answer:

   ➢ *If participant returns for services, grantee should continue serving participant without exiting them;*

   ➢ *If participant does not return for services within 90 days, grantee should exit participant. In both cases, the grantee takes credit for the placement, but not for an entered employment.*

2) **What if a participant earns wages during the quarter after exit, but then loses his/her job afterwards?**

   Answer: *The participant is exited from the program; grantee is given credit for the entered employment. Additionally:*

   ➢ *If the participant attains additional employment, earning wages during the second and third quarter after exit, then the grantee takes credit for employment retention. The participant's employment does not have to be continuous or with the same employer;*

   ➢ *If the participant does not attain additional employment and returns for additional service, the grantee may reenroll the individual and restart the process;*

   ➢ *If the participant does not attain employment and never returns for services, then he/she is counted as an exiter AND as an entered employment, but NOT as employment retention.*

3) **When do we exit a participant**?

   Answer:

   ➢ *When a participant is placed and earns wages in the following quarter. In that situation, the exit quarter is the one in which the participant was placed;*

   ➢ *If a participant is placed, loses his position within the same quarter, and does not return for additional training and/or services within 90 days;*

➢ *If a participant does not return for training and/or services within 90 days.*

Note: Providing post-employment/retention services does not prevent a participant from being exited